

TOGUT, SEGAL & SEGAL LLP  
One Penn Plaza, Suite 3335  
New York, New York 10119  
Telephone: (212) 594-5000  
Fax: (212) 967-4258  
Frank A. Oswald  
Neil Berger

*Counsel to Tannor Capital Advisors LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

*In re*

**SEARS HOLDINGS CORPORATION, *et al.*,  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 18-23538 (RDD)**

**(Jointly Administered)**

**AFFIDAVIT OF SERVICE OF JOINDER OF TANNOR CAPITAL  
ADVISORS LLC TO THE MOTION OF MIEN CO. LTD., HELEN ANDREWS,  
STRONG PROGRESS GARMENT FACTORY COMPANY, LTD,  
SAMIL SOLUTIONS, SHANGHAI FOCHIER, PURCELL MURRAY,  
A&A HK INDUSTRIAL, MINGLE FASHION, MANSHEEN INDUSTRIES, LTD.  
AND AMW VIETNAM CO. LTD. TO ASSIGN THE MATTER TO MEDIATION**

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); SHC Licensed Business LLC (3718); SHC Promotions LLC (9626); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF NEW YORK )

DENISE CAHIR, being duly sworn, deposes and says: deponent is not a party to the action, is over 18 years of age and resides at New York, New York.

On September 23, 2019, deponent served a copy of the *Joinder of Tannor Capital Advisors LLC to the Motion of Mien Co. Ltd., Helen Andrews, Strong Progress Garment Factory Company, Ltd., Samil Solutions, Shanghai Fochier, Purcell Murray, A&A HK Industrial, Mingle Fashion, Mansheen Industries, Ltd. and AMW Vietnam Co. Ltd. to Assign the Matter to Mediation* upon each of the parties set forth on the service list annexed hereto, by (i) depositing true copies of same enclosed in pre-paid, properly addressed wrappers, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York, or (ii) FedEx overnight mail, as indicated.

/s/ Denise Cahir  
DENISE CAHIR

Sworn to before me this  
24<sup>th</sup> day of September, 2019

/s/ Krista Lee Ackerman  
NOTARY PUBLIC

**SERVICE LIST**

<b><u>Party</u></b>	<b><u>Method of Service</u></b>
The Honorable Robert D. Drain United States Bankruptcy Judge United States Bankruptcy Court, S.D.N.Y. 300 Quarropas Street White Plains, NY 10601	FedEx Overnight Mail
Sears Holdings Corporation 3333 Beverly Road Hoffman Estates, IL 60179 Attn: Stephen Sitley Esq. Luke J. Valentino, Esq.	First-Class Mail
Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153 Attn: Ray C. Schrock, P.C. Jacqueline Marcus, Esq. Garret A. Fail, Esq. Sunny Singh, Esq.	First-Class Mail
Office of the United States Trustee for Region 2 201 Varick Street, Suite 1006 New York, New York 10014 Attn: Paul Schwartzberg, Esq.	First-Class Mail
Skadden, Arps, Slate, Meagher & Flom LLP <i>Attorneys for Bank of America, N.A.</i> 4 Times Square New York, NY 10036 Attn: Paul D. Leake, Esq. Shana A. Elberg, Esq. George R. Howard, Esq.	First-Class Mail
Davis Polk & Wardell LLP <i>Attorneys for Citibank, N.A.</i> 450 Lexington Avenue New York, NY, 10017 Attn: Marshall S. Huebner, Esq. Eli J. Vonnegut, Esq.	First-Class Mail
Cleary, Gottlieb <i>Attorneys for JPP, LLC</i> One Liberty Plaza New York, NY, 10006 Attn: Sean A. O'Neal, Esq.	First-Class Mail

<b><u>Party</u></b>	<b><u>Method of Service</u></b>
Kelley Drye & Warren LLP <i>Attorneys for Computershare Trust Company, N.A.</i> 101 Park Avenue New York, NY 1017 Attn: Eric R. Wilson, Esq. Benjamin D. Feder, Esq. T. Charlie Liu, Esq.	First-Class Mail
Seyfarth Shaw LLP <i>Attorneys for Wilmington Trust, National Association</i> 620 Eighth Avenue New York, NY 10018 Attn: Edward M. Fox, Esq.	First-Class Mail
Carter Ledyard & Milburn LLP <i>Attorneys for the Bank of New York Mellon Trust Company</i> 2 Wall Street New York, NY 10015 Attn: James Gadsden, Esq.	First-Class Mail
Locke Lord LLP <i>Attorneys for the Pension Benefit Guaranty Corporation</i> 111 South Wacker Drive Chicago, IL 60606 Attn: Brian A. Raynor, Esq.	First-Class Mail
Akin Gump Strauss Hauer & Feld LLP <i>Attorneys for the Official Committee of Unsecured Creditors</i> One Bryant Park New York, NY 10036 Attn: Philip C. Dublin, Esq. Ira Dizengoff, Esq. Sara Lynne Brauner, Esq.	First-Class Mail